

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA)
)
VS)
)
JUAN FUNES)

CR 11-80 WES

MOTION TO CONTINUE SENTENCING

Now comes the Defendant, Juan Funes, by counsel, and moves this Court to continue the sentencing in the within case to a date on or after October 17, 2018. As reasons therefore, it is stated as follows:

1. Both Respondent and counsel have met with a new counsellor. These meetings have been separate and a plan of treatment is being formulated.

2. Mr. Funes has met the terms and conditions of his most recent release and has taken the daily testing without negative results.

3. A short additional period is requested to have a comprehensive plan in place to form a part of the sentencing recommendation by the Defendant to the Court.

WHEREFORE, the premises considered, it is requested that the Court continue the sentencing on violation to a date on or after October 17, 2018.

JUAN FUNES
by his attorney,
/s/ Robert D. Watt Jr.

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Date: September 15, 2018

CERTIFICATION

I hereby certify that I did on the 15th day of September 2018 file the within Motion utilizing the Courts ECF electronic filing system and did, thereby, provide notice to Milind Shah, Esq. Assistant U.S. Attorney.

/s/ Robert D. Watt Jr.
